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7 Attorney for *Defendant Max Joseph Plog-Horowitz*

8 **United States District Court**
9 **Northern District of California**
10 **Oakland Division**

11 UNITED STATES OF AMERICA,

12 *Plaintiff,*

13 vs.

14 MAX JOSEPH PLOG-HOROWITZ,

15 *Defendant.*

Case No. 4:12-cr-00661-CW-1

STIPULATION AND ~~[PROPOSED]~~ ORDER
PERMITTING TRAVEL

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17 **STIPULATION PERMITTING TRAVEL**

18 Mr. Plog-Horowitz wishes to be allowed to leave his home on the following days throughout the
19 holiday season:

20 November 22, 2012	10:00 a.m. - 10:00 p.m.	(Thanksgiving)
21 December 8, 2012	10:00 a.m. - 9:00 p.m.	(Hanukkah)
22 December 15, 2012	10:00 a.m.- 6:00 p.m.	(Holiday preparation)
23 December 24, 2012	10:00 a.m. - 10:00 p.m.	(Christmas Eve)
24 December 25, 2012	10:00 a.m. - 10:00 p.m.	(Christmas)
25 December 31, 2012	10:00 a.m. - 10:00 p.m.	(New Years Eve)

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27 Additionally, Mr. Plog Horowitz has an opportunity to go to a job fair in Sacramento, California on

November 13, 2012 in the Eastern District of California.

1 He is not currently allowed to leave his home except for court appearances and meetings with
2 counsel, and not outside of the Northern District of California..

3 Mr. Plog-Horowitz will provide the addresses of all of the locations he intends to visit on the
4 above-listed days to Pretrial Services. Furthermore, Mr. Plog-Horowitz will be with at least one of his
5 parents (and custodians) at all times during his time away from his home for the holiday events.

6 AUSA Mann and Ms. Gibson agree with these requests.
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Accordingly, it is requested and agreed that Mr. Plog-Horowitz' release conditions shall be modified to permit him to leave his home and travel with prior approval from and at the direction of Pretrial Services on the following dates and for the following times:

November 13, 2012	Sacramento Job Fair in the Eastern District of California (TBD)	
November 22, 2012	10:00 a.m. - 10:00 p.m.	(Thanksgiving)
December 8, 2012	10:00 a.m. - 9:00 p.m.	(Hanukkah)
December 15, 2012	10:00 a.m.- 6:00 p.m.	(Holiday preparation)
December 24, 2012	10:00 a.m. - 10:00 p.m.	(Christmas Eve)
December 25, 2012	10:00 a.m. - 10:00 p.m.	(Christmas)
December 31, 2012	10:00 a.m. - 10:00 p.m.	(New Years Eve)

It is further agreed that Mr. Plog Horowitz will be with at least one of his parents at all times during the holiday events on 11/22, 12/8, 12/15, 12/24, 12/25 and 12/31.

IT IS SO STIPULATED.

November 8, 2012

Date

/s/ ACB

ANNE C. BELES,
Attorney for *Defendant*

November 8, 2012

Date

/s/ JCM

JAMES C. MANN,
Assistant U.S. Attorney

November 8, 2012


Date

/s/ VG

VICTORIA GIBSON,
U.S. Pretrial Services

IT IS SO ORDERED.

Dated: November 9, 2012


HONORABLE KANDIS WESTMORE
United States District Judge
Northern District of California